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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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**SHENZHEN GOLDELY GARMENTS
IMPORT AND EXPORT INC.,**

Docket No. 3:25-cv-06313-MAS-RLS

Petitioner,

**DECLARATION OF AVROHOM
FLOHR IN OPPOSITIN TO THE
PETITION**

v.

**POINT COLLECTION LLC AND THE
GALLERY COLLECTION LLC,**

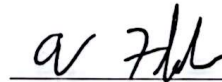
Respondent.

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Pursuant to 28 U.S.C. § 1746, I, Avrohom Flohr, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the owner of the Defendants in this action and make this certification in opposition to the petition to confirm the foreign arbitration award. The facts recited herein are based on my personal knowledge and the records of Defendants.
2. I am a sabbath observant Jew, and was not available for my employees to discuss any business issues due to my religious beliefs on May 4, 2024.
3. Fernando Machado is the production manager at our company. His primary responsibilities is managing our production in various countries as well as dealing with

- logistics. Mr. Machado does not have access to any bank accounts nor is he authorized to make any payments or to enter into settlement agreements on behalf of the Defendants.
4. These types of decisions are made entirely by me. At no time in the history of 9 years in the company, has anyone besides myself sent out any payments or entered into settlement of disputed claims.
 5. The dispute with Goldely started when they began stealing our trade secrets and selling them to competitors.
 6. I never consented to the settlement agreement, and when they brought us to arbitration pursuant to the "settlement agreement" we specifically objected that the agreements was a violation of applicable Chinese law due to the duress they had placed Fernando under. We never waived this defense.
 7. A true copy of our written defenses are annexed hereto as **Exhibit A**.
 8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 26th day of June, 2025.



Avrohom Flohr